



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

October 25, 2012

CROSSROADS GRASSROOTS POLICY
STRATEGIES

1401 NEW YORK AVENUE, NW, SUITE 1200
WASHINGTON, DC 20005

Response Due Date

11/29/2012

IDENTIFICATION NUMBER: C90011719

REFERENCE: OCTOBER QUARTERLY REPORT (07/01/2012 - 09/30/2012)

Dear Filer:

This letter is prompted by the Commission's preliminary review of the Report of Independent Expenditures Made and Contributions Received (FEC Form 5) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** Additional information is needed for the following 2 item(s):

1. It appears that 48-hour notices for the attached independent expenditures were filed late. Please be advised that you are required to file 48-hour reports once you make independent expenditures aggregating \$10,000 or more with respect to a given election any time during the calendar year up to and including the 20th day before the election. The report must be received at the Commission 11:59 p.m. Eastern Standard/Daylight Time by the second day after the communication was publicly distributed or otherwise disseminated. In the report, you must include information for all independent expenditures that have not been previously reported. Each time you make subsequent independent expenditures relating to the same election that aggregate \$10,000 or more, you must file another 48-hour report disclosing these independent expenditures. (11 CFR § 109.10(c) and (e)) Please provide clarification regarding the timeliness of your 48-hour reporting for the independent expenditures in question. Further, if the date disclosed on your Form 5 was the date of payment, rather than the date of public dissemination or distribution, please provide the date of dissemination or distribution.

In addition, please be advised that you are required to disclose these independent expenditures, along with contribution and disbursement information, on Form 5 as a regularly scheduled quarterly report. (11 CFR § 109.10(b) and (e))

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2. Line 7 of your FEC Form 5 filing discloses disbursements made for independent expenditure(s). However, no contributions are disclosed on Line 6, "Total Contributions." Each contributor who made a donation in excess of \$200 used to fund the independent expenditure(s) must be itemized on Schedule 5-A, including their identification information. Please amend your report to provide the missing information. (11 CFR §§ 109.10(e)(1)(vi) and 114.10(f))

Please note, you will not receive an additional notice from the Commission on this matter. Requests for extensions of time in which to respond will not be considered. Failure to comply with the provisions of the Act may result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1161.

Sincerely,



Christopher Whyrick
Senior Campaign Finance Analyst
Reports Analysis Division

Late Filed 48-Hour Notices
Crossroads Grassroots Policy Strategies (C90011719)

Name	Date	Amount	Purpose	Candidate
Crossroads Media	7/27/2012	\$8,444.80	TV/Media Placement	Shelley Berkley
Crossroads Media	7/27/2012	\$451,181.39	TV/Media Placement	Shelley Berkley
Upgrade Films	7/27/2012	\$12,869.50	TV/Media Production	Shelley Berkley
Crossroads Media	9/12/2012	\$923,130.70	TV/Media Placement	Barack Obama
McCarthy Hennings Media, Inc.	9/12/2012	\$34,331.00	TV/Media Placement	Barack Obama